UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

CASE NO. 1:24cv00040 JLS-MJR

NOTICE OF PLAINTIFFS' MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65(b)(2), Plaintiffs Consumer Financial Protection Bureau, the People of the State of New York, by Letitia James, Attorney General of the State of New York, the State of Colorado *ex rel*. Philip J. Weiser, Attorney General, the State of Delaware *ex rel*. Kathleen Jennings, Attorney General, the People of the State of Illinois through Attorney General Kwame Raoul, the State of Minnesota by its Attorney General Keith Ellison, the State of North Carolina *ex rel*. Joshua H. Stein, Attorney General, and the State of Wisconsin (collectively, Plaintiffs), submit this Motion to Extend the Temporary Restraining Order. A supporting Memorandum of Law and Proposed Report and Recommendation are filed with this Motion.

Dated: January 22, 2024

Respectfully submitted, Attorneys for Plaintiff Consumer Financial Protection Bureau

ERIC HALPERIN Enforcement Director

RICHA SHYAM DASGUPTA Deputy Enforcement Director

TIMOTHY M. BELSAN Assistant Litigation Deputy

/s/ Vanessa Buchko

Vanessa Buchko

E-mail: vanessa.buchko@cfpb.gov

Phone: 202-435-9593

Monika Moore

E-mail: monika.moore@cfpb.gov

Phone: 202-360-5905 Joseph Sanders

E-mail: joseph.sanders@cfpb.gov

Phone: 202-377-9846 1700 G Street, NW Washington, DC 20552 Facsimile: (202) 435-7722

And

LETITIA JAMES

Attorney General of the State of New York

/s/ Christopher L. Boyd

Christopher L. Boyd Assistant Attorney General 350 Main Street, Suite 300A Buffalo, NY 14202

Phone: (716) 853-8457

Email: Christopher.Boyd@ag.ny.gov

Attorney for State of New York

PHILIP J. WEISER

Attorney General State of Colorado

/s/ Kevin J. Burns

Kevin J. Burns, CO Reg. No. 44527 Pro hac vice application pending Senior Assistant Attorney General Colorado Department of Law Ralph L. Carr Judicial Center Consumer Protection Section 1300 Broadway, 6th Floor Denver, CO 80203 Phone: (720) 508-6110 Kevin.Burns@coag.gov

Attorneys for Plaintiff State of Colorado, ex rel. Philip J. Weiser, Attorney General

KATHLEEN JENNINGS Attorney General State of Delaware

/s/ Marion M. Quirk

Marion M. Quirk (pro hac vice, pending)
Director of Consumer Protection
Kevin D. Levitsky (pro hac vice
forthcoming, if required)
Deputy Attorney General
Delaware Department of Justice
820 N. French Street, 5th Floor
Wilmington, DE 19801
Phone: (302) 683-8810
Marion.Quirk@delaware.gov
Kevin.Levitsky@delaware.gov
Attorneys for State of Delaware

KWAME RAOUL Attorney General State of Illinois

By: /s/ Greg Grzeskiewicz
Greg Grzeskiewicz, Chief, Consumer Fraud
Bureau
Pro hac vice application forthcoming, if
required
Daniel Edelstein, Supervising Attorney,
Consumer Fraud Bureau
Pro hac vice application forthcoming, if
required

Amanda E. Bacoyanis, Assistant Attorney General, Consumer Fraud Bureau Pro hac vice application forthcoming Matthew Davies, Assistant Attorney General. Consumer Fraud Bureau Pro hac vice application forthcoming, if required Office of the Illinois Attorney General 100 W. Randolph Street, 12th Floor Chicago, Illinois 60601 312-814-2218 Greg.Grzeskiewicz@ilag.gov Daniel.Edelstein@ilag.gov Amanda.Bacoyanis@ilag.gov Matthew.Davies@ilag.gov

Attorneys for the People of the State of Illinois

KEITH ELLISON Attorney General of Minnesota

/s/ Evan Romanoff
Evan Romanoff
Assistant Attorney General
Pro hac vice application pending
445 Minnesota Street, Suite 1200
St. Paul, Minnesota 55101-2130
Telephone: (651) 728-4126
evan.romanoff@ag.state.mn.us

Attorney for the State of Minnesota By Its Attorney General, Keith Ellison

JOSHUA H. STEIN Attorney General of North Carolina

/s/ M. Lynne Weaver

M. Lynne Weaver (pro hac vice pending)
Special Deputy Attorney General
N.C. State Bar No. 19397
114 W. Edenton Street
Raleigh, NC 27602
Telephone: (919) 716-6039
lweaver@ncdoj.gov

Attorney for the State of North Carolina

JOSHUA L. KAUL Attorney General of Wisconsin

/s/ Lewis W. Beilin

Assistant Attorney General (pro hac vice pending)
Wisconsin Department of Justice
17 West Main Street
Post Office Box 7857
Madison, WI 53707-7857
(608) 266-1221
beilinlw@doj.state.wi.us

Attorney for State of Wisconsin